

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Formalities

Claim 3, the specification, and the abstract have been revised to place the application in proper U.S. format and correct the informalities noted in items 4-6 on pages 2-3 of the Official Action. Because the changes are all formal in nature, it is respectfully submitted that the changes do not involve new matter.

2. Rejection of Claims 1-19 Under 35 USC §103(a) in view of U.S. Patent No. 4,801,787 (Suzuki)

This rejection is respectfully traversed on the grounds that the Suzuki patent fails to disclose or suggest at least the following features of the claimed invention:

- a. a method of storing and retrieving a **number** of PIN codes used to access protected-access devices by:
 - a1. associating each PIN code with a **unique feature** of the corresponding protected-access device (such as a serial number of the device), and
 - a2. protecting the stored PIN code/unique feature combinations with a **common access code**,
as recited in **claim 1** (instead, Suzuki discloses storing a PIN code for a single device within the device itself, and using personal data as an access code to retrieve the PIN code);
- b. storage of the access code and/or PINs in encoded form, as recited in **claim 3**;
- c. use of the access code as a key to encode the PINs (and/or unique features), as recited in **claim 4**;
- d. a method in which the access code is not permanently stored, as recited in **claim 5** (this is exactly contrary to Suzuki's permanently stored personal data);

- e. use of the unique feature as a key to encode the PIN code, as recited in **claim 6** (Suzuki does not involve multiple protected-devices with “unique features” that can be used to encode the PIN code—the Examiner will note that this encoding is separate from the protection provided by the “access code”);
- f. use of the serial number or a unique property of the protected device as the unique feature, and automatic determination and entry of the unique feature, as recited in **claims 8-10** (Suzuki does not include or require input of a unique feature since Suzuki does not concern multiple protected devices); and
- g. corresponding features involving storage of PIN codes, unique features of protected devices, and an access code, as recited in apparatus **claims 14-18**.

The purpose of the claimed invention is to provide a way to conveniently and securely store **multiple PIN codes** associated with **multiple protected-access devices** (the protected devices being in the form, for example, of smart cards or magnetic stripe cards). As explained in the introductory portion of applicant’s specification, it was known to use an access code to protect a single PIN code for a particular protected-device, or even to protect multiple PIN codes. The problem with such arrangements is that it is difficult to remember which PIN codes belong to which devices. The present invention solves that problem by associating each stored PIN code with a unique feature of the protected-device. When the PIN code is to be retrieved, **two** inputs are required, the **first** being the **access code** that protects all of the PIN codes, and the **second** being the **unique feature** of the protected device (preferably, by automatically reading it from the protected-device itself when the protected-device is inserted into the reader that stores the PIN codes, although the unique feature can be a serial number that the user reads and inputs through a keyboard).

The Suzuki patent teaches the equivalent of an access code, which takes the form of personal identification information so that it is easy to remember. **However, the Suzuki patent does not disclose or suggest any equivalent to the claimed use, in addition to the access code, of a “unique feature of the protected-device” to enable retrieval of a particular PIN**

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code associated with the device (from among multiple stored PIN codes associated with multiple protected-devices).

The reason that the Suzuki does not, and cannot, suggest storage of the claimed “unique feature” of a protected device is that the Suzuki patent does not disclose a memory in which PIN codes for multiple protected devices are stored (for example, in the memory of a pocket reader of the type disclosed in the first paragraph on page 4 of the specification). The PIN code of Suzuki is stored in the protected-device itself, and not in the memory of a reader that can be used with multiple protected devices. **A PIN code stored in the protected device itself does not need to be associated with a unique code that identifies the device with which the PIN code is associated.** There is therefore no possible need to use the claimed unique feature association in connection with the method and apparatus of Suzuki.

In the Official Action, the Examiner appears to equate the personal data stored in the protected device of Suzuki with the claimed unique feature. This interpretation overlooks the recitation that the unique feature is not personal data concerning a user of the protected device as in the Suzuki patent, but to the contrary is “a unique feature **of at least one protected device.**” The reason for using a unique feature of the protected device, in addition to the access code, is that the claimed invention concerns storage of multiple PIN codes for multiple devices, and in particular the problem of how to associate the correct PIN code with the correct device. The Suzuki patent does not concern storage of multiple PIN codes for multiple devices, and therefore does not require each PIN code to have an identifier associated with a corresponding one the multiple devices.

Since the Suzuki patent does not disclose or suggest any feature corresponding to storage of a PIN code in association with a unique feature of the device to which the PIN code corresponds, as recited in claims 1 and 14, it could not possibly have suggested used of the access code to encode the unique feature and/or PIN code, or use of the unique feature to encode the PIN code, as recited in various dependent claims.

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In summary, because the Suzuki patent does not disclose a **two** step method of storing and retrieving multiple PIN codes associated with multiple protected devices using a single access code, and corresponding apparatus, involving:

- (i) using the access code to protect the storage area for the multiple PIN codes and
- (ii) using stored "unique features" of the multiple protected devices to associate retrieved PIN codes with particular ones of the multiple protected devices,

the PIN code of Suzuki being stored within the single protected device that is protected by the PIN code, withdrawal of the rejection of claims 1-19 under 35 USC §103(a) in view of the Suzuki patent is respectfully requested.

Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

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